

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ANDRE ROYAL,

Plaintiff,

v.

NATIONAL FOOTBALL LEAGUE
MANAGEMENT COUNCIL *et al.*,

Defendants.

Case No. 19-cv-5164
Judge Alison J. Nathan

**DECLARATION OF STACEY R. EISENSTEIN IN SUPPORT OF DEFENDANT
NATIONAL FOOTBALL LEAGUE MANAGEMENT COUNCIL’S
MOTION TO DISMISS THE COMPLAINT**

I, Stacey R. Eisenstein, hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, as follows:

1. I am a partner with the law firm Akin Gump Strauss Hauer & Feld LLP, counsel for Defendant National Football League Management Counsel (“NFLMC”) in the above-captioned matter. I am admitted *pro hac vice* to practice before this Court.

2. This declaration is submitted in support of the Memorandum of Law in Support of Defendant NFLMC’s Motion to Dismiss the Complaint.

3. Attached hereto as Exhibit A is a true and correct copy of the Amended Complaint, filed with this Court on August 26, 2019.

4. Attached hereto as Exhibit B is a true and correct copy of Magistrate Judge Robert W. Lehrburger’s Report & Recommendation filed in *Hudson v. Nat’l Football Mgmt. Council, et al.*, 18-cv-4483 (S.D.N.Y.).

5. Attached hereto as Exhibit C is a true and correct copy of District Judge Gregory H. Woods's Order adopting Judge Lehrburger's Report & Recommendation filed in *Hudson v. Nat'l Football Mgmt. Council, et al.*, 18-cv-4483 (S.D.N.Y.).

6. Attached hereto as Exhibit D is a true and correct copy of the Bert Bell/Pete Rozelle NFL Player Retirement Plan as of April 1, 2009.

Dated: October 3, 2019
Washington, DC

/s/ Stacey R. Eisenstein
STACEY R. EISENSTEIN